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GUILFORD F. THORNTON, JR. gthornton@stokesbartholomew.com

May 2, 2003

The Honorable Sara Kyle, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243

RE:

Complaint of Ben Lomand Communications, Inc. ("BLC") against Citizens Telecommunications Company of Tennessee, LLC

Docket No. 02-01221

Dear Chairman Kyle:

On behalf of Citizens Telecommunications Company of Tennessee, LLC ("Citizens"), I am enclosing with this letter the confidential and proprietary portions of Citizens' response to discovery requests from Ben Lomand Communications, Inc. in this matter. The Authority issued recently a protective order in this matter. A copy is being served on counsel of record in this proceeding.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,

cc:

Mike Swatts Gregg Sayre

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	
COMPLAINT OF BEN LOMAND	)
COMMUNICATIONS, INC.,	
Against	) Docket No. 02-01221
CITIZENS TELECOMMUNICATIONS	)
COMPANY OF TENNESSEE, LLC,	)
d/b/a FRONTIER COMMUNICATIONS	)
OF TENNESSEE.	)

PROPRIETARY AND CONFIDENTIAL SUPPLEMENTAL RESPONSE OF CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE, LLC TO DISCOVERY REQUESTS OF BEN LOMAND COMMUNICATIONS, INC.

Citizens Communications Company of Tennessee, LLC ("Citizens") herein responds further to Ben Lomand Communications, Inc. ("Ben Lomand") first set of discovery requests. Subject to and reserving objections as set forth in its first response. Exhibit 1, attached, contains answers to the previous discovery requests made by Ben Lomand. All responses are Confidential and Proprietary under the protective order issued in this matter.

Respectfully submitted,

Guilford F. Thornton, Jr. (No. 14508)

Charles W. Cook, WI (No. 14274)

roudor

STOKES BARTHOLOMEW EVANS & PETREE

424 Church Street, Suite 2800

Nashville, Tennessee 37219

(615) 259-1450

Attorneys for Citizens Communications Company of Tennessee, d/b/a Frontier

Communications of Tennessee

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	)
	)
Complaint of Ben Lomand	)
Communications, Inc.	) Docket No. 02-1221
Against	)
Citizens Telecommunications Company of Tennessee, LLC	) )

## **AFFIDAVIT**

State of Tennessee ) County of Davidson )

The undersigned, being duly sworn, deposes and says:

- 1. I am counsel for Citizens Telecommunications Company of Tennessee, LLC, a party in TRA Docket No. 02-01221
- 2. Upon information and belief, the attached exhibit is confidential and proprietary under the terms of the Protective Order in this docket dated February 18, 2003. Such response contains "sensitive information" as protected by the Order.

FURTHER AFFIANT SAITH NOT.

Executed this 2<sup>nd</sup> day of May, 2003

Guilford F. Thornton

Sworn to and subscribed before me this the 2<sup>nd</sup> day of May, 2003.

Notary Public

My commission expires: 7-30-05

## **CERTIFICATE OF SERVICE**

I hereby certify that on this the  $2^{nd}$  day of May, 2003, a true and exact copy of the foregoing was forwarded via hand delivery or U.S. Mail to the following:

H. LaDon Baltimore Farrar & Bates, LLP 211 7<sup>th</sup> Avenue North, Suite 420 Nashville, TN 37219

Randall Gilliam
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Guilford F. Thornton/